

SCF

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M-11-484**

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 1542)

WILLIAM DIAZ,  
also known as  
"Angel David Morales,"  
"Miguel Martinez" and  
"Nelson Morales,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JONATHAN WELCH, being duly sworn, deposes and states that he is a Special Agent with the United States Department of State, Bureau of Diplomatic Security, duly appointed according to law and acting as such.

Upon information and belief, on or about May 6, 2011, within the Eastern District of New York and elsewhere, the defendant WILLIAM DIAZ did willfully and knowingly use and attempt to use a passport the issuance of which was secured by reason of one or more false statements, to wit: the use of someone else's identity, including use of a false name, place of birth, date of birth, and Social Security Number.

(Title 18, United States Code, Section 1542)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. On May 6, 2011, defendant WILLIAM DIAZ arrived at John F. Kennedy International Airport in Queens, New York, aboard American Airlines Flight #AA 1582 from Santo Domingo, Dominican Republic. The defendant presented a valid United States Passport #303498027 in the name of "Angel David Morales" to immigration authorities and requested admission to the United States as a returning U.S. citizen. The passport presented indicated that "Angel David Morales" was born in Puerto Rico in July 1960.

2. After his arrival, defendant DIAZ was referred to Passport Control Secondary for further inspection. During that inspection, defendant DIAZ's fingerprints were taken and entered into a law enforcement database for analysis. Defendant DIAZ's fingerprints were found to match a subject named "Nelson Morales," also known as "Miguel Martinez" and "Angel D. Morales," an individual with a lengthy criminal record.

3. The application for United States Passport #303498027 lists the applicant as Angel David Morales, with a place of birth in Puerto Rico, a date of birth of July 30,

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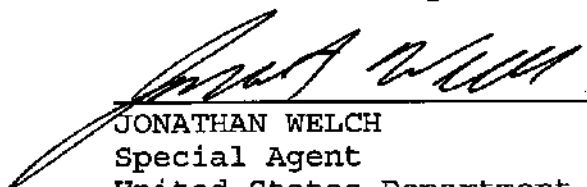
<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1960, and a social security number of XXXXX7860. Customs officials contacted law enforcement authorities in Puerto Rico in an effort to confirm the identity of "Angel David Morales." It was subsequently learned that "Angel David Morales," born in July 1960, is a completely different individual with his own criminal record in Puerto Rico. Puerto Rican authorities provided Customs officials with a photograph of "Angel David Morales." The individual depicted in the photograph is not the defendant WILLIAM DIAZ.

4. In response to questioning defendant DIAZ indicated that he had a son named "Samuel David Morales" with a date of birth in February 1984. Customs officials then searched an immigration database and a passport database, and located an individual named Samuel David Diaz with the same date of birth in February 1984, which the defendant provided for his son.

5. Customs officials contacted "Samuel David Diaz," and requested that he come to JFK Airport for questioning. Samuel David Diaz arrived at JFK Airport and identified the defendant's passport and New York Driver's License photos as depicting his father - WILLIAM DIAZ. Samuel David Diaz also stated in sum and substance, that WILLIAM DIAZ is not a United States Citizen.

WHEREFORE, your deponent respectfully requests that the defendant WILLIAM DIAZ be dealt with according to law.



JONATHAN WELCH  
Special Agent  
United States Department of State,  
Bureau of Diplomatic Security

Sworn to before me this  
7th day of May, 2011

Honorable Marilyn D. Go  
United States Magistrate Judge  
Eastern District of New York